

REMARKS/ARGUMENTS

REMARKS

Claims 1-25 and 27-28 are pending in this application.

CLAIM REJECTIONS UNDER 35 USC 103

Claims 1, 2, 12-16, 18, 19, and 26 are rejected under 35 USC 103(a) as being unpatentable over United States patent no. 6, 581,094 to Gao in view of Anuff et al. and Ferrel et al. Claims 1, 2, 12-16, 18, 19 and 26, as now amended, are each allowable for the reasons that follow.

Claim 1 recites a content handling module including content definition, data structure and content item editors that receive a content definition, produce content data structure, and receive content item information, respectively. Claim 1 further recites a format handling module including a template editor that generates formatting information, as well as a publisher. The Examiner concedes that none of the prior art being relied upon discloses all of these features. The Examiner asserts, however, that claim 1 is unpatentable, because a combination of Gao, Anuff et al., and Ferrell et al. teaches all of the elements recited at claim 1, relying on Gao as teaching the content definition, data structure and content item editors, Anuff et al. to teach the template editor, and Ferrell to teach the publisher. It is respectfully submitted that not only does Gao fail to teach Applicant's content definition, data structure and content item editors, but there is also insufficient suggestion to combine Anuff et al. and Gao. Claim 1 and other claims have been amended to more clearly recite the advantageous integrated group of software-based modules and functional capabilities of Applicant's invention.

GAO'S FAILURE TO TEACH APPLICANT'S CONTENT HANDLING COMPONENTS

Gao fails to teach the content definition, data structure and content item editors of Applicant's content handling module. A universal device descriptor (UDD), as taught by Gao at column 4, lines 45-58, is assigned to each of several networked digital devices. These digital devices are hardware components, and their unique UDDs describe device/hardware parameters. Document type definition (DTD) is described as precisely defining a logical structure of a UDD, so that each manufacture or device administrator can fill the contents of its devices. Beginning at line 27, the DTDs are described as a set of syntax rules for document tags. As understood, document tags are sequences of characters in a markup language used to provide formatting information about a document. These portions of Gao that are being relied upon by the Examiner neither teach nor suggest a content handling module of an integrated content and format handling system, and clearly do not teach or suggest the components of Applicant's content handling module, namely the content definition editor, the data structure editor and the content item editor. In fact, Gao does not recite any of these content-handling components of Applicant's invention. As mentioned, Gao's UDDs uniquely describe hardware devices within a computer network, and the DTDs handle formatting information relating to documents, but neither relates to editing or otherwise particularly handling the content that may be formatted or otherwise included within documents.

The Examiner, in the response to arguments at page 11, items 20 and 22 of the office action, explains that he is in fact citing the editable nature of information regarding a digital device, as taught by Gao, to meet Applicant's content definition editor. However, digital devices are hardware objects that have digital circuits that process digital data, whereas content is information

represented by digital data or objects that may be stored in a computer memory and/or displayed on a computer screen.

For the above reason alone, the rejection of claim 1 is overcome. The rest of claims 2-25 and 27-28 are allowable for the same reason.

LACK OF SUGGESTION TO COMBINE GAO AND ANUFF ET AL.

The Examiner has cited column 1, lines 62-67 of Anuff et al. as providing the suggestion to combine Gao and Anuff et al. As mentioned above, Gao's teaching revolves around identifying multiple networked devices and handling information relating to the multiple devices. The relied upon portion of Anuff et al. relates, on the other hand, to providing access to various software environments through a library of object-oriented classes. The "objects" referred to by Anuff et al. are not tangible objects, but are instead digital objects that may be represented by stored data in digital memory and/or rendered on a display screen. Thus, the Gao specification is primarily hardware-centric and hardware focused, whereas the Anuff et al. specification is instead software-centric and software-focused. Moreover, neither Gao suggests a combination of his description relating to handling multiple hardware devices, nor do Anuff et al. suggest a combination of its software-based description with a group of hardware devices. Even if they did, the hardware devices of Gao do not meet any of the components of Applicant's software-based content handling module.

For this second reason alone, Claim 1 is allowable. The rest of claims 2-25 and 27-28 are further allowable for this second reason.

CONTENT ITEM AND FORMATTING INFORMATION STORAGE IN SEPARATE DATABASES

Claim 5 recites that the content item information and formatting information are stored in separate databases. This is facilitated by the modular nature of Applicant's system. That is, Applicant's system includes content definition, data structure and content item editors for handling content item information that may be stored in a first subset of one or more databases, while Applicant's system also includes a template editor a template editor that generates and stores formatting information separately from the content item information. Neither Gao nor Anuff et al. teaches the three content handling components of Applicant's system, and clearly do not describe a modular system that is configured for separately handling content and formatting information, nor that is configured for handling content and formatting information being that is stored is separate databases.

Therefore, claim 5 is allowable for this additional reason. Claims 17-25 and 27-28 are allowable for this same additional reason.

With regard to Claim 16, the Examiner asserts that Gao's teachings regarding multiple devices such as first and second printers, and a digital camera meet Applicant's one or more different content items having one or more links produced between them. Applicant's content items and the links between them are digital representations of information that are digitally linked, whereas Gao's devices are tangible electronic and mechanical devices that are linked with electronic cables or RF transceivers. Gao's devices and links have no relationship to Applicant's digital content items and digital links.

Claims 3-11, 17, and 20-25 are rejected under 35 USC 103(a) as being unpatentable over Gao, Anuff et al., Ferrell et al. and Plantz et al. Each of these claims is allowable for the multiple reasons provided above, and in particular due

to the failure of Gao to teach Applicant's content definition, data structure and content item editors and the lack of any suggestion to combine Gao and Anuff et al. to meet the advantageous integration of the multiple recited content handling editors of Applicant's content handling module with the recited template editor.

With further respect to Claims 3, 4 and 7, the Examiner is relying upon column 4, lines 64-67 of Plantz et al. to provide the required suggestion to combine with the other references. However, a computer-based publishing group that enhances collaboration between and among individuals separated by distance or time has nothing to do with providing or utilizing forms for content definition. Claims 3, 4 and 7 are thus allowable for this additional reason.

With respect to claims 5, 6 and 17, the Examiner concedes that Ferrell et al. do not teach separate databases or multiple databases for storing content and format information. The Examiner nonetheless rejects these claims stating that the title layouts and content illustrated at Figure 1 of Ferrell et al. "are 2 different entities" and preserving space, memory and organization on databases would motivate one skilled in the art to use two databases. The Examiner has not provided any reason why saving information on two databases instead of one preserves space, memory and organization, and it probably has the opposite effect. Applicant's system advantageously has separate modules for handling content and formatting information, i.e., respectively, Applicant's content definition, data structure and content item editors and Applicant's template editor. None of the references being relied upon by the Examiner teaches or suggests that content and formatting information are stored on separate databases, and just as explained above, neither do these references teach a system having integrated content handling editors for processing the content information along with a format handling template editor for processing the formatting information. In the context of Applicant's modular system, the storage on separate databases of content item and formatting information may be handled with ease compared with a hypothetical system having content and format handling capabilities

disposed outside of a modular context. For this additional reason, claims 5, 6 and 17 are each allowable.

REMARKS RELATING TO THE EXAMINER'S RESPONSE TO ARGUMENTS

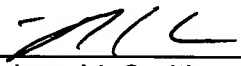
Although the Examiner's responses to arguments at items 20 and 22 has been addressed in a different context above, Applicant respectfully submits the following in summary form. With respect to item 20, the Examiner states that the content definition would be information regarding the digital device. Gao's digital devices are hardware; that is electro-mechanical components. Content, on the other hand, comprises digital representations of information. The three content handling components of the content handling module recited by Applicant form part of a system of integrated software modules, not hardware devices. The Examiner continues at item 22 to note that Gao teaches that each digital device has a unique UDD dedicated to it, which describes parameters, such as device characteristics and capabilities.... Gao's hardware electro-mechanical device teachings simply do not meet Applicant's content item editor software module, nor in any way Applicant's advantageous integrated system of content and format handling and publishing software modules.

Appl. No. 09/696,627
Amendment dated March 7, 2005
Reply to Office Action mailed January 13, 2005

The Commissioner is authorized to charge any deficiencies in fees and credit any overpayment of fees to Deposit Account No. 07-1896. A duplicate page is enclosed.

Respectfully submitted,

DLA PIPER RUDNICK GRAY CARY US LLP

Dated: 3-7-5 By 
Andrew V. Smith
Reg. No. 43,132
Attorney for Applicant

DLA PIPER RUDNICK GRAY CARY US LLP
153 Townsend Street, Suite 800
San Francisco, CA 94107
Telephone: 415-836-2522
Facsimile: 415-836-2501

Customer No.: 29585